

CHAITMAN LLP

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Presentment Date: September 26, 2018 12:00 PM

Objection Date: September 19, 2018

*Attorneys for Defendants Janet Jaffe Trust UA dtd 4/20/90;
Alvin Jaffe Trust dtd 4/20/90; and Janet Jaffe, individually
and in her capacity as, Trustee for the Janet Jaffe Trust UA
dtd 4/20/90 and the Alvin Jaffe Trust dtd 4/20/90*

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

Adv. Pro. No. 08-1789 (SMB)

SIPA LIQUIDATION

(Substantively Consolidated)

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Liquidation of
Bernard L. Madoff Investment Securities LLC,

Plaintiff,

v.

JANET JAFFE TRUST UA DTD 4/20/90; ALVIN
JAFFE TRUST DTD 4/20/90; and JANET JAFFE,
individually and in her capacity as, Trustee for the
Janet Jaffe Trust UA dtd 4/20/90 and the Alvin Jaffe
Trust dtd 4/20/90,

Defendants.

Adv. Pro. No. 10-04798 (SMB)

**DECLARATION OF HELEN DAVIS CHAITMAN IN SUPPORT
OF APPLICATION TO WITHDRAW AS COUNSEL**

I, Helen Davis Chaitman, hereby declare, under penalty of perjury pursuant to 28 U.S.C. §1746, as follows:

1. I am a partner with Chaitman LLP, counsel of record to Defendants Janet Jaffe Trust UA Dtd 4/20/90; Alvin Jaffe Trust dtd 4/20/90; and Janet Jaffe, individually and in her capacity as, Trustee for the Janet Jaffe Trust UA dtd 4/20/90 and the Alvin Jaffe Trust dtd 4/20/90, (the “Defendants”). I submit this declaration in support of an application for an Order pursuant to Rule 2090-1(e) of the Local Bankruptcy Rules of this Court: (1) authorizing Chaitman LLP to withdraw as counsel to the Defendants; and (2) granting such other and further relief as the Court deems just and proper. Unless otherwise stated, the foregoing is based on my personal knowledge.

2. The Trustee commenced this adversary proceeding against the Defendants on December 01, 2010 (the “Adversary Proceeding”).

3. Thereafter, the Defendants retained Becker & Poliakoff LLP to represent them.

4. On behalf of the Defendants, while at Becker & Poliakoff, LLP, I filed a Notice of Substitution of Counsel and Proposed Order on September 10, 2015 (ECF Doc. No. 43).

5. Substitution of Counsel was So Ordered on September 21, 2015 (ECF No. 45).

6. On behalf of the Defendants as a partner of Chaitman LLP, I filed a Notice of Appearance and Request for Service of Papers on October 05, 2015 (ECF Doc. No. 47).

7. Subsequently Bruce Jaffe on behalf of Defendants advised me that he was retaining other counsel. I respectfully request that the Defendants be granted a reasonable period of time to retain new counsel.

8. The Adversary Proceeding will not be disrupted or unduly delayed as a result of this firm’s withdrawal as Defendants’ counsel.

9. Accordingly, cause exists to grant the application authorizing Chaitman LLP to withdraw as counsel for the Defendants.

Dated: September 5, 2018
New York, New York

/s/ Helen Davis Chaitman